

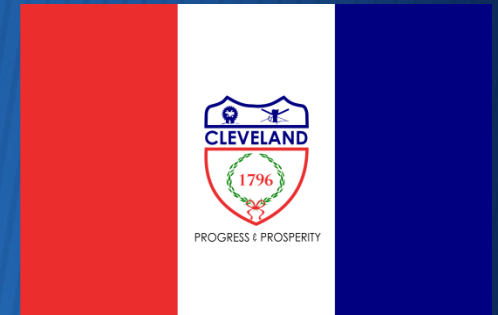


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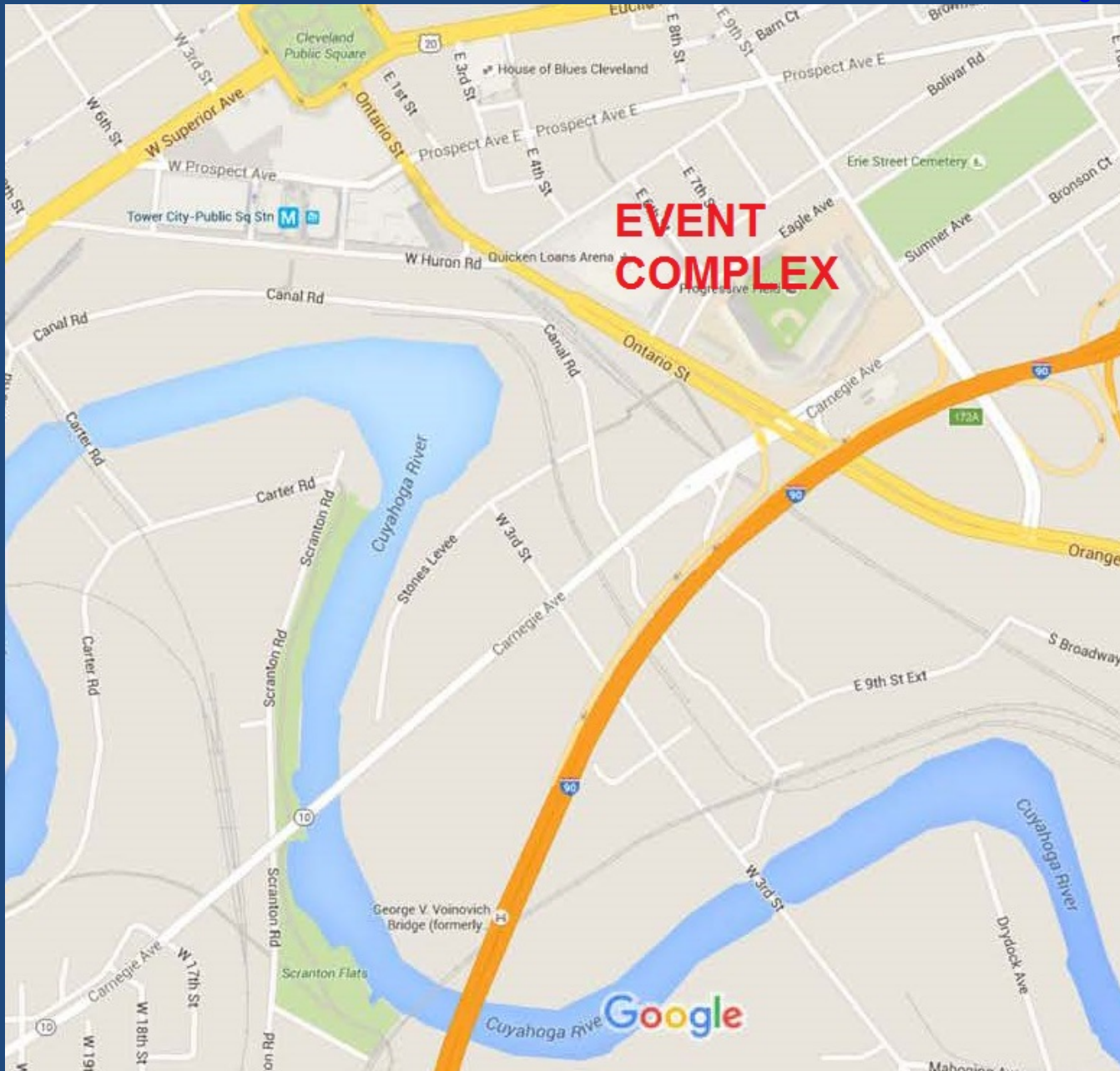
# Parade Route and Public Access

**2016 Republican National Convention  
Cleveland, Ohio**



It is the policy of the City of Cleveland that persons and groups have the right to organize and participate in peaceful parades . . . on the streets and public grounds of the City, subject to reasonable restrictions designed to protect public safety, persons and property, and to accommodate the interest of persons not participating in the assemblies to use the streets and sidewalks to travel to their intended destinations, and use public grounds for their intended purposes.

- Cleveland Codified Ordinances § 411.05(f)



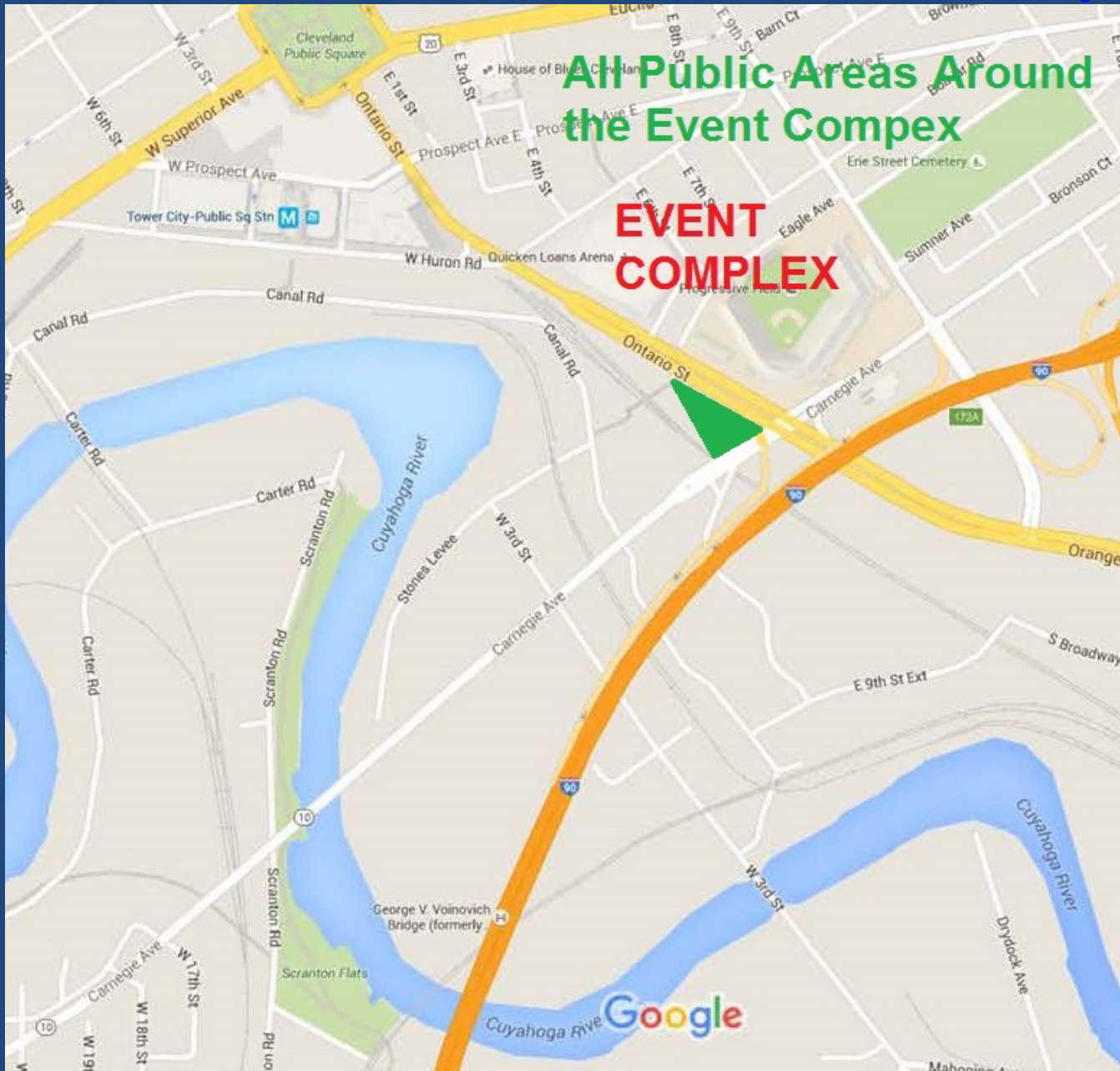


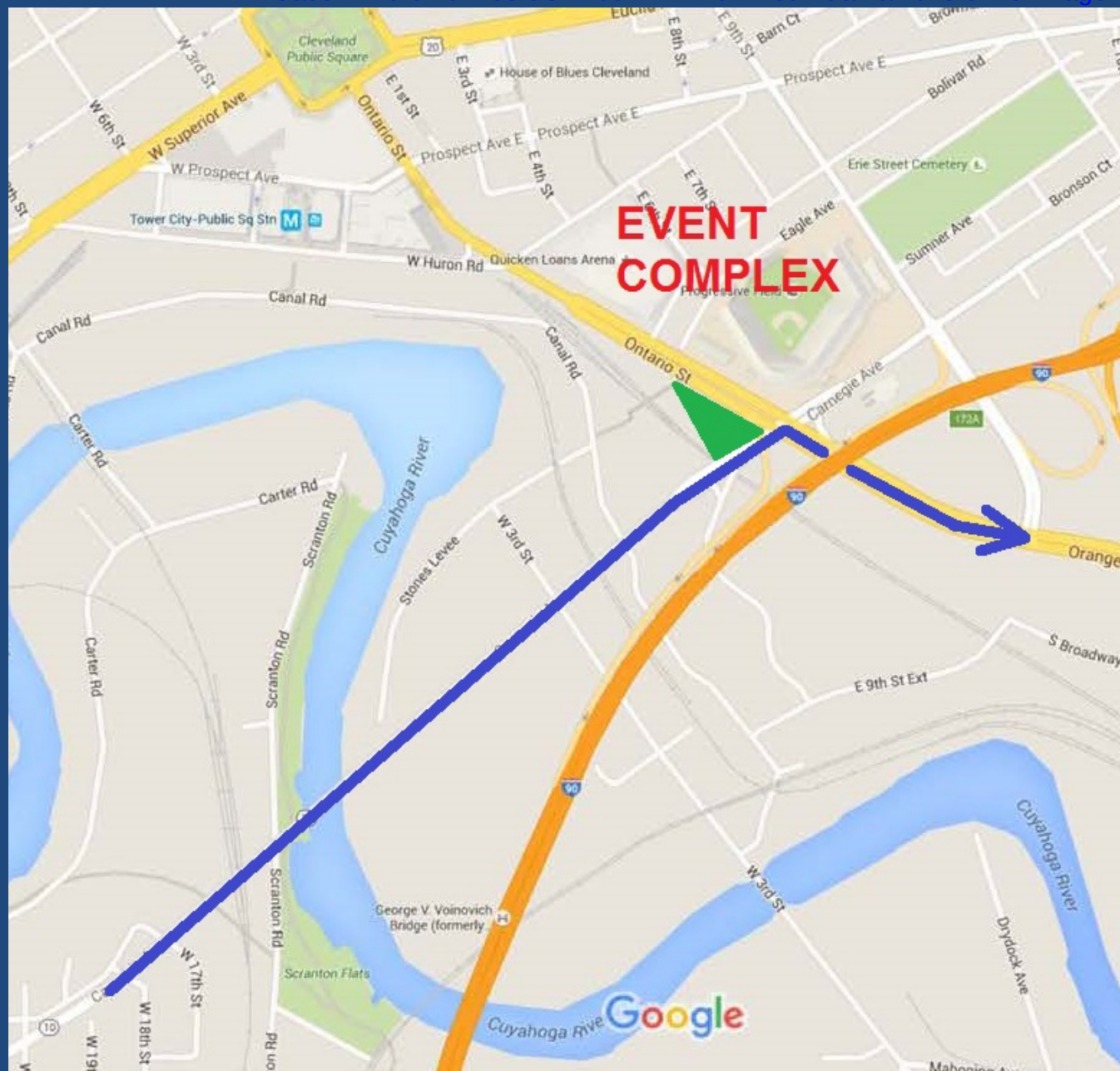
## All Public Areas Around the Event Complex

**EVENT  
COMPLEX**

### Public Viewing Areas:

- The “Triangle” at Ontario St. and Carnegie Ave.
- Public Areas Around the Event Complex
- 1<sup>st</sup> Amendment Activity Not Restricted to a Designated Area

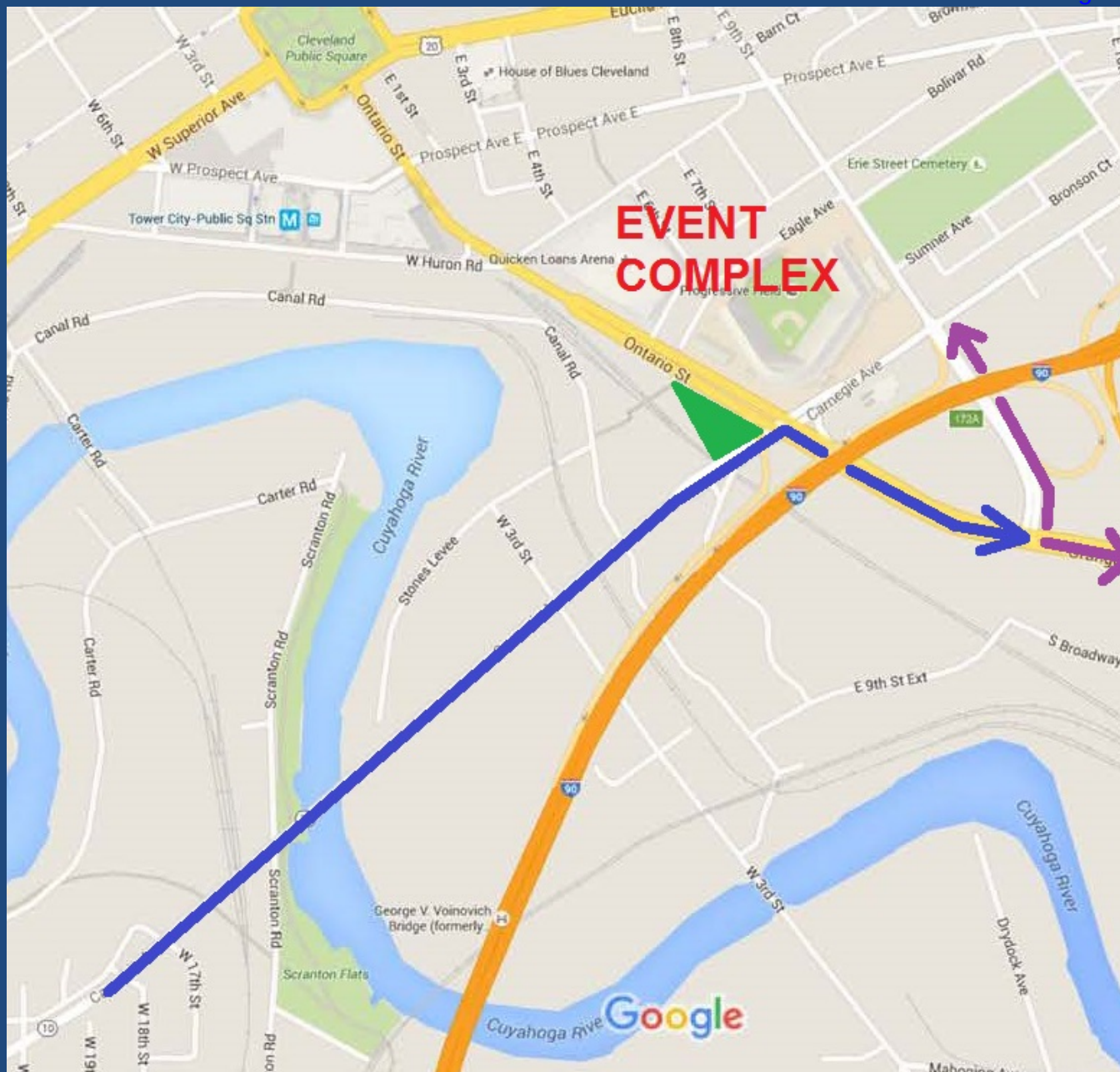




## Parade Route:

- Starting at Carnegie Ave. near W. 20<sup>th</sup> St.
- Terminating at Orange Ave. and E. 9<sup>th</sup> St.





Routes from  
Parade Terminus  
to Public Viewing  
Areas:

- E. 9<sup>th</sup> St. to  
Prospect Ave.
- Orange Ave. to E.  
14<sup>th</sup> St.

# Parade Route Offers Clear Sightlines To Convention

## West End of Carnegie Bridge looking toward the Event Complex



Image capture: Oct 2015 © 2016 Google



# Parade Route Offers Clear Sightlines To Convention

## East End of Carnegie Bridge looking toward the Event Complex



Image capture: Oct 2015 © 2016 Google



# Parade Route Comes Within 160 Feet of the Event Complex

Carnegie Ave. at Ontario St.



Image capture: Jun 2011 © 2016 Google

# Parade Route

## View from the Event Complex





# Parade Route

## View from a Patio within the Event Complex



# Prime Public Viewing

The “Triangle” near Ontario St. and Carnegie Ave.  
Looking toward the Event Complex





# Prime Public Viewing

The “Triangle” near Ontario St. and Carnegie Ave.  
Looking toward the Event Complex



# View from the Event Complex

## Carnegie Bridge and the “Triangle”





# View from the Event Complex

## The “Triangle” from Ontario Avenue



# Prime Public Viewing

## East 9<sup>th</sup> St. looking toward the Event Complex



Image capture: Sep 2009 © 2016 Google

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# View from the Event Complex

## East 9<sup>th</sup> St. and Eagle Ave.



Image capture: Jun 2011 © 2016 Google

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# Prime Public Viewing

## Prospect Ave. looking toward the Event Complex





# Prime Public Viewing

## Prospect Ave. looking toward the Event Complex



# Prime Public Viewing

## East 4<sup>th</sup> St. looking toward the Event Complex





# Prime Public Viewing

E. Huron Rd. at East 7<sup>th</sup> St. looking toward the Event Complex



# View from the Event Complex

## East 4<sup>th</sup> St. from Quicken Loans Arena





# View from the Event Complex

## Prospect Ave. from Quicken Loans Arena



# View from the Event Complex

## Prospect Ave. from Quicken Loans Arena





**The Cleveland Parade Route is Superior  
To Routes That Have Been Approved by  
the Courts For Other National  
Conventions**

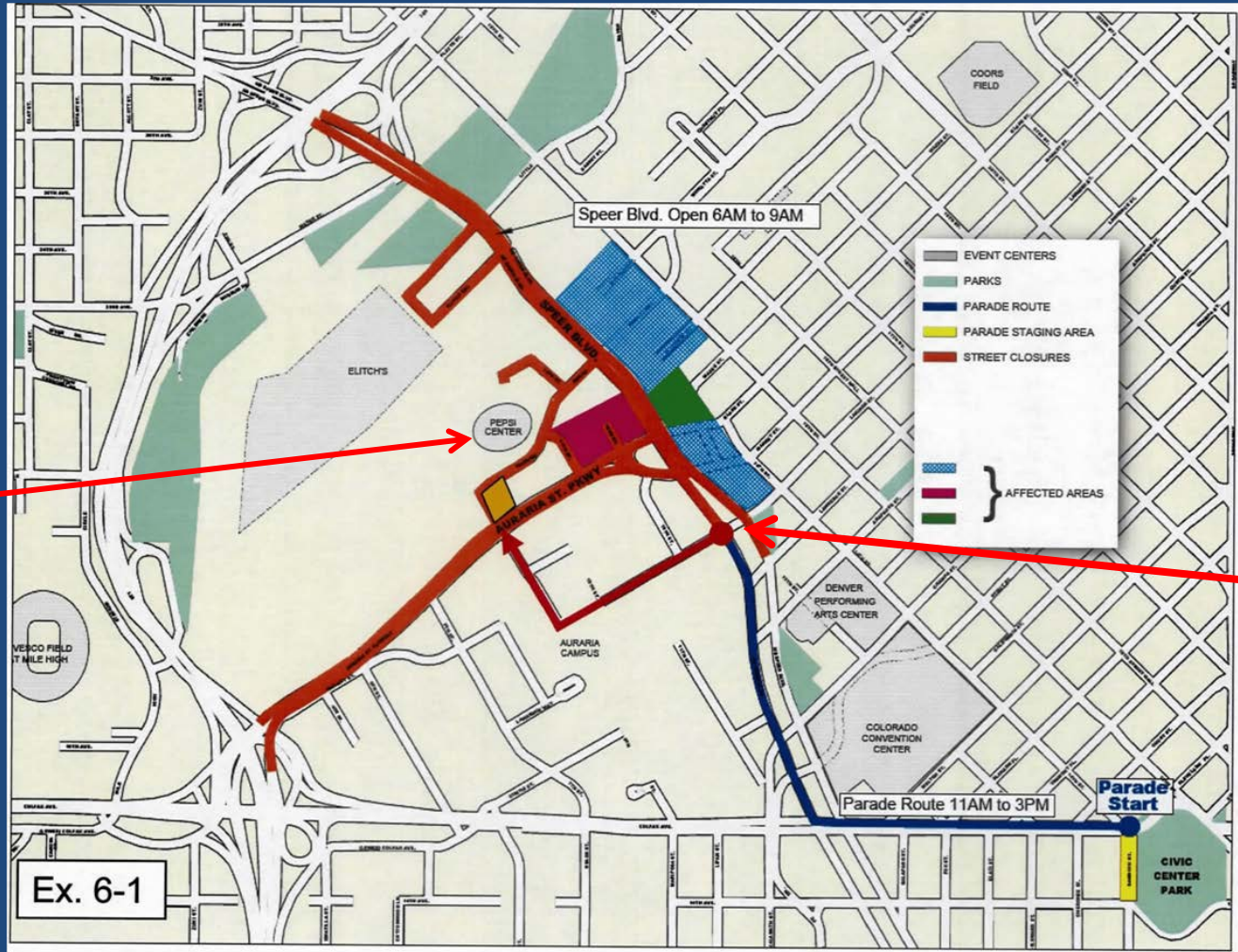


# Cleveland Offers Better Access than Most Conventions

	Cleveland (2016)	Tampa (2012)	Charlotte (2012)	Denver (2008)	Boston (2004)	New York (2004)
Closest point of parade to event complex	<b>160 ft</b>	860 ft	950 ft	1200+ ft	780 ft to bldg.; one block to drop-off point for 50% delegates	250 ft
Number of parades during convention	18		18	20		11+
Public limited to specified viewing zone near event?	<b>No</b>	Yes	<b>No</b>	Yes	Yes	Yes
Closest point of public to event complex	300 ft to Arena from E. 4 <sup>th</sup> St.	450 ft to bldg.	270 ft to building	200 ft to delegate bus stop	600 ft to bldg.	250 ft to some delegates

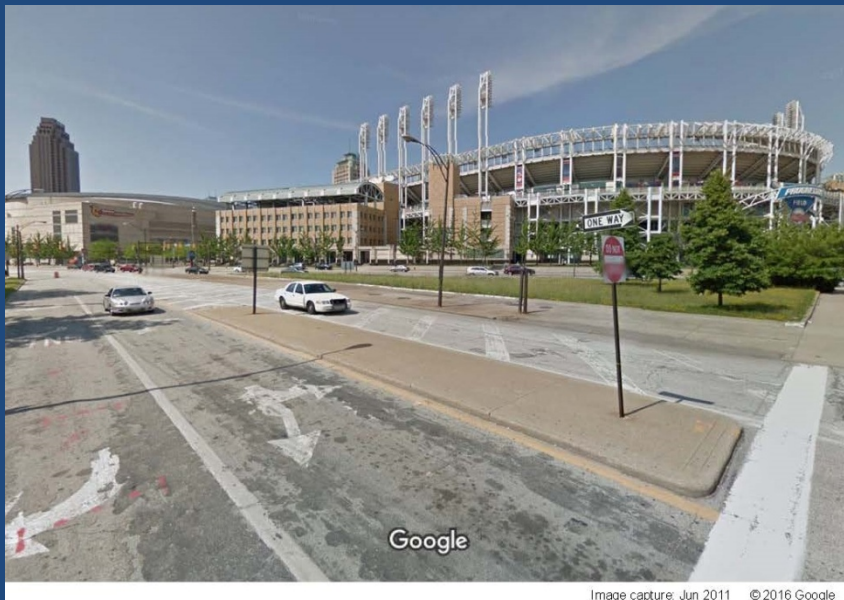


# Denver's 2008 Parade Route Never Came within 1200 Feet of the Pepsi Center



# The Cleveland Parade Route Comes Much Closer to the Event Complex than the Denver Parade Route

**Cleveland: 160 feet away from the Event Complex**



**Denver: At least 1200 feet away and out of sight from the Pepsi Center**





# The Cleveland Parade Route Comes Much Closer to the Event Complex than the Denver Parade Route

## View of the Parade Routes

### Cleveland view from the Event Complex



### Denver view from the Event Complex



# The Public Has Much Better Access to the Event Complex

## Complex than in Denver

Public Viewing of the Event Complexes

Cleveland view from East 4<sup>th</sup> St.

Denver view from the designated “Free Speech” zone





# The Public Has Much Better Access to the Event Complex

## Complex than in Denver

Public Viewing of the Event Complexes

Cleveland view from East 9<sup>th</sup>  
Street



Denver view from the  
designated “Free Speech” zone



# The Public Has Much Better Access to the Event Complex

## Complex than in Denver

Public Viewing of the Event Complexes

Cleveland view from the  
“Triangle”



Denver view from the  
designated “Free Speech” zone



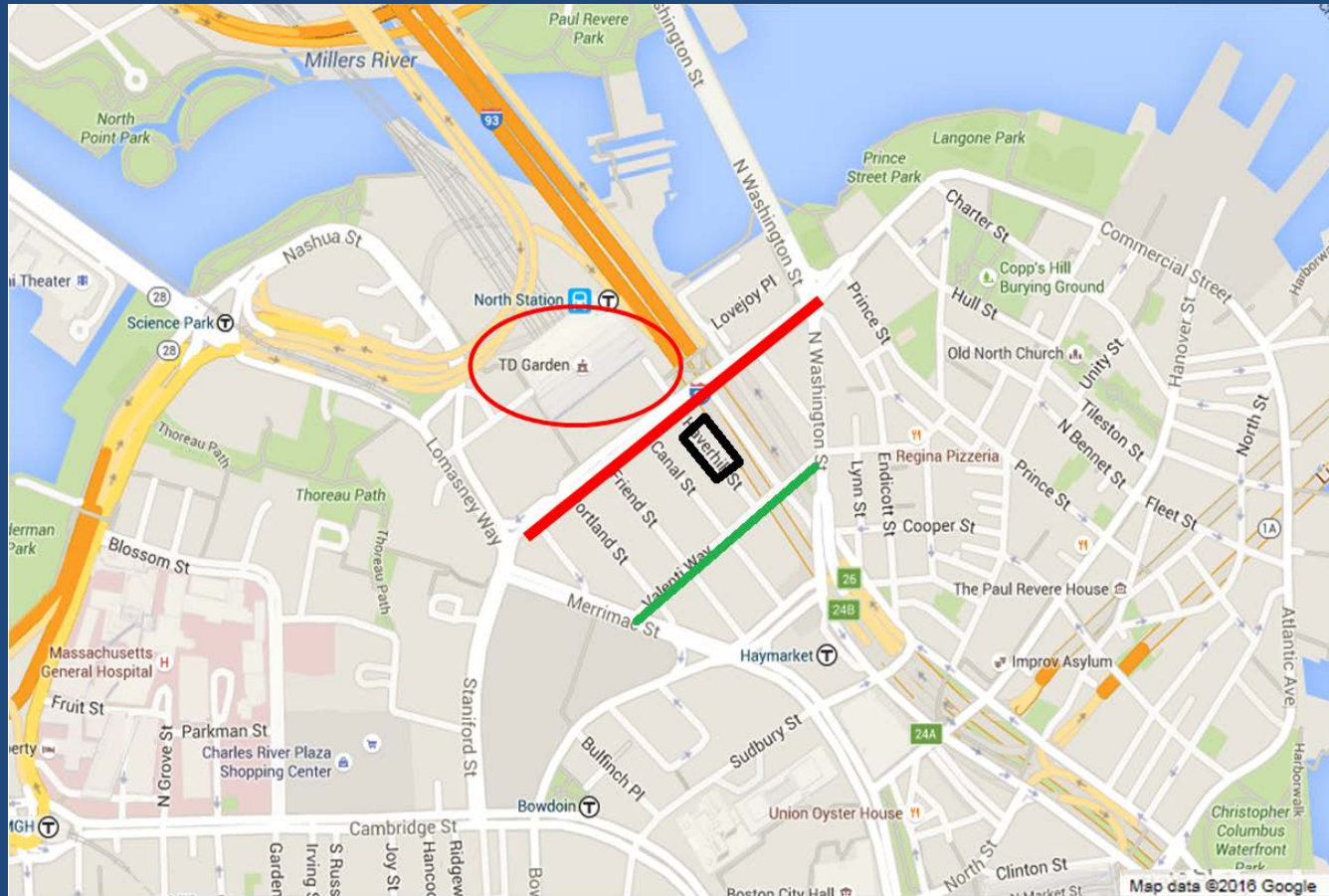


## Denver's Parade Route and Public Access Were Upheld by the Court

“[T]he Court finds that the restrictions on access to city streets within and adjacent to the Pepsi Center grounds are narrowly tailored to advance significant governmental interests.”

*Am. Civil Liberties Union v. City of Denver*, 569 F. Supp. 2d 1142, 1180 (D. Colo. 2008)

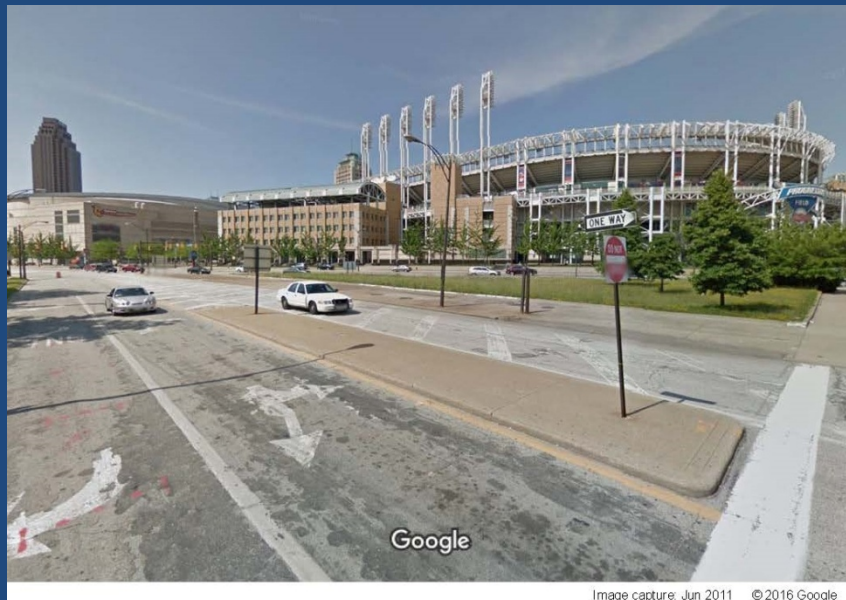
# Boston's 2004 Parade Route Never Came within 600 Feet of T.D. Garden Arena





# The Cleveland Parade Route Comes Much Closer to the Event Complex than the Boston Parade Route

Approximately 160 feet away from the Event Complex



Over 600 feet away from T.D. Garden Arena



# The Cleveland Parade Route Comes Much Closer to the Event Complex than the Boston Parade Route

## View of the Parade Routes

### Cleveland view from the Event Complex



### Boston view from the Event Complex





# The Public Has Much Better Access to the Event Complex

## Public Viewing of the Event Complexes

### Cleveland view from Prospect Ave.



### Boston view from the "Demonstration Zone"



# The Public Has Much Better Access to the Event Complex

## Complex than in Boston

### Public Viewing of the Event Complexes

Cleveland view from East 4<sup>th</sup> St.



Boston view from the  
“Demonstration Zone”





# The Public Has Much Better Access to the Event Complex

## Complex than in Boston

Cleveland view from the  
“Triangle”



Boston “Demonstration Zone”



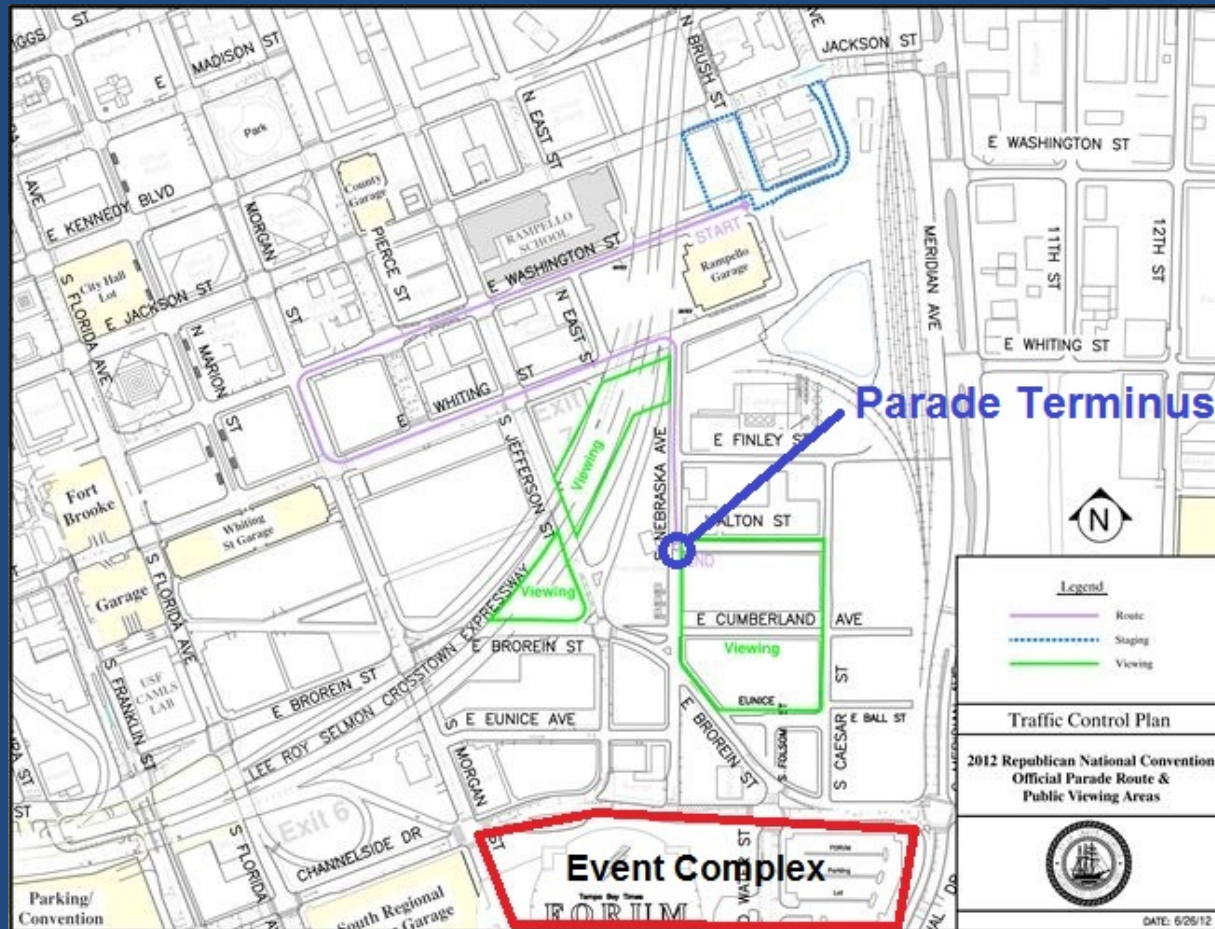
## **Boston's Parade Route and Public Access Were Upheld by the Court**

“[T]here is no injunctive relief that I could fashion that would vindicate plaintiffs' First Amendment rights without causing quite significant harm to the City, the delegates, and the public interest as broadly defined in the form of increased risk to those attending the DNC and further strain on the overtaxed manpower resources of public safety personnel.”

*Coalition to Protest the Democratic Natl. Convention v. City of Boston*, 327 F. Supp. 2d 61, 76 (D. Mass. 2004)



# Tampa's 2012 Parade Route Never Came within 860 Feet of the Tampa Bay Times Forum



# The Cleveland Parade Route Comes Much Closer to the Event Complex than the Tampa Parade Route

Approximately 160 feet away from the Event Complex



Image capture: Jun 2011 © 2016 Google

Over 860 feet away from the Tampa Bay Times Forum



Image capture: Sep 2015 © 2016 Google



# The Public Has Much Better Access to the Event Complex

## Complex than in Tampa

### Public Viewing of the Event Complexes

**Cleveland view from Prospect Ave.**



**Tampa view from the closest viewing area at Eunice St.**



Image capture: Jun 2013 © 2016 Google

# **Tampa's Official Parade Route and Public Access Were Not Challenged in Court.**



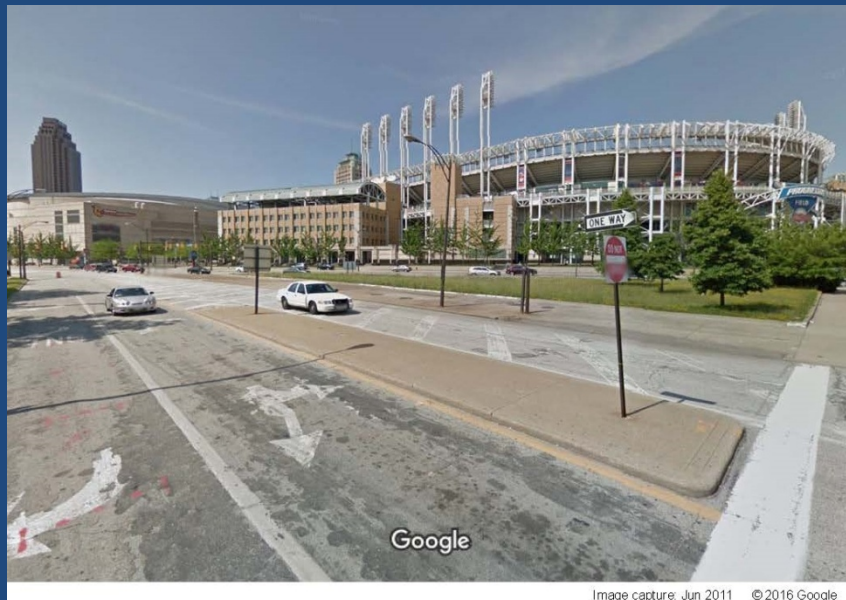
# Charlotte's 2012 Parade Route Never Came within 950 feet of the Time Warner Arena





# The Cleveland Parade Route Comes Much Closer to the Event Complex than the Charlotte Parade Route

Approximately 160 feet away from the Event Complex



Over 950 feet away from the Time Warner Arena



# The Public Has Much Better Access to the Event Complex

## Public Viewing of the Event Complexes

**Cleveland view from Prospect Ave.**



**Charlotte view from the closest viewing area at N. Brevard St. and E. 6<sup>th</sup> St.**



# **Charlotte's Official Parade Route and Public Access Were Not Challenged in Court.**

